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June 25, 2012

VIA ECF

Honorable Madeline Cox Arleo, U.S.M.J.
M.L. King, Jr., Federal Building & Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Sync Labs, et al. v. Fusion Manufacturing, et al.
Civil Action No. 11-cv-03671 (WHW)(MCA)

Dear Judge Arleo,

I represent Defendants Fusion Manufacturing, LLC and Michael Ferchak in this civil action. I am in receipt of Mr. Radulescu's June 22, 2012 Notice of Motion for reconsideration (which apparently did not include a declaration) of Your Honor's June 7, 2012 Order granting Defendants' motion to disqualify Radulescu as attorney for Plaintiff Sync Labs, LLC. Mr. Radulescu's Notice of Motion also requests a stay of the Order that directed Sync Labs to retain counsel by July 6, 2012, subject to dismissal of Sync Labs' Complaint for lack of representation. Because the stay motion's July 16th return date circumvents Your Honor's direction for Sync Labs to retain counsel by a date certain – which Your Honor first directed Sync Labs to do by Letter Order dated February 9, 2012 – we object to Radulescu's request for a stay and ask that it be denied forthwith. I will file timely opposition to the reconsideration motion.

Respectfully submitted,
NIEDWESKE BARBER HAGER, LLC

Christopher W. Hager

Cc: Mr. Codrut Radu Radulescu (via ecf)